

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CRISTIAN GARCIA-CHAVEZ, an individual,

CASE NO. 2:18-cv-00040

Plaintiff,

J.B. HUNT CORP., J.B. HUNT
TRANSPORT, INC., ORLANDO
JOHNSON, and DOES I through X; and
ROE CORPORATIONS II through XX,
inclusive,

Defendants.

**STIPULATION TO EXTEND
SCHEDULED DEADLINES
(SECOND REQUEST)**

Pursuant to Local Rules IA 6.1 and 26-4, Plaintiff Cristian Garcia-Chavez and Defendants J.B. Hunt Transport Inc. and Orlando Johnson (collectively the “Defendants,” and together with Plaintiff, the “Parties”) hereby stipulate and agree to extend the deadlines set forth in the previously filed Joint Discovery Plan for a period sixty (60) days. This is the second stipulation to extend any deadline in this proceeding.

I. Discovery Completed to Date

To date, the Parties each propounded written discovery upon one another. Defendants served their responses to Plaintiff's written discovery on April 30, 2018. Plaintiff served his responses to Defendants' written discovery June 6, 2018. An independent medical examination of the Plaintiff was also conducted on June 8, 2018.

II. Discovery Yet to be Completed

Plaintiff's deposition is currently scheduled for June 20, 2018. Additionally, the Parties are still working to coordinate and schedule the depositions of (1) defendant Orlando Johnson, (2) a corporate designee of JB Transport, Inc., (3) many of Plaintiff's medical providers, and (4) Plaintiff's wife. As detailed below, the Parties have encountered numerous complications in scheduling the depositions of the medical providers. The Parties agree that additional discovery is necessary to clarify certain categories of damages claimed by Plaintiff. The Parties have also not exchanged expert reports or conducted any expert discovery to date. The

1 Parties also will need to address any additional areas of discovery which become apparent
2 through the course of discovery and litigation in this matter.

3 **III. Necessity of Requested Extension of Time**

4 While the Parties have exchanged responses to written discovery, additional discovery
5 is necessary with respect to certain categories of damages claimed by Plaintiff. Such
6 discovery may necessitate the retention of additional expert witnesses in this case. The current
7 deadline for expert disclosures is July 9, 2018. Additionally, complications continue to exist
8 in securing dates to depose several of the Plaintiff's medical health care providers. The current
9 deadline to complete discovery is September 7, 2018. Due to these issues, the Parties
10 believe a sixty (60) extension to all remaining deadlines is necessary. The Parties are
11 confident the requested extension will provide a sufficient amount of time for the Parties to
12 complete additional discovery as to the categories of damages claim by Plaintiff, identify all
13 necessary expert witnesses, and schedule and complete all necessary depositions in this matter.

14 **IV. Requested Modifications to the Scheduling Order**

15 The Parties stipulate and agree to modify the Joint Discovery Plain as follows:

- 16 1. **Discovery Cutoff Date:** November 6, 2018
- 17 2. **Expert Disclosures:** September 7, 2018
- 18 3. **Expert Rebuttal:** October 9, 2018
- 19 4. **Dispositive Motions:** December 10, 2018
- 20 5. **Joint Pretrial Order:** January 7, 2019
- 21 6. **Interim Status Report:** September 7, 2018

22
23 If dispositive motions are filed, the
24 deadline for filing the joint pretrial
25 order will be suspended until 30
26 days after decision on the
27 dispositive motions or further
28 court order.

29 IT IS SO AGREED this 18th day of June, 2018.

1 HENNESS & HAIGHT

2

3 By /s/ Jacob S. Smith

Jacob S. Smith
4 Breanna K. Hartmann
5 8972 Spanish Ridge Avenue
Las Vegas, NV 89148

6 **Attorneys for Plaintiff**

THORPE SHWER, P.C.

7

8 By /s/ Tyler Grim

9 William L. Thorpe (*Pro Hac Vice pending*)
10 Tyler Grim (*Pro Hac Vice pending*)
11 3200 North Central Avenue
12 Suite 1560
13 Phoenix, AZ 85012

14 **Attorneys for Defendants**

15 MESSNER REEVES LLP

16

17 By /s/ Renee M. Finch

18 Renee M. Finch, Esq.
19 Nevada Bar No. 13118
20 8945 West Russell Road, Suite 300
21 Las Vegas, Nevada 89148

22 **Co-Counsel for Defendants**

23

24 **ORDER**

25 IT IS SO ORDERED.

26 DATED: 6-19-2018

27



28 UNITED STATES MAGISTRATE JUDGE